

Message

From: Burdett, Cheryl [burdett.cheryl@epa.gov]
Sent: 4/6/2018 6:57:35 PM
To: Atkinson, Benjamin [atkinson.ben@epa.gov]; Burdett, Cheryl [burdett.cheryl@epa.gov]
Subject: Conversation with Benjamin Atkinson

Burdett, Cheryl 12:08 PM:

Did any of your farms put on their SnapPlus Spreading report for manure source as Generic?

Benjamin Atkinson 12:09 PM:

I've not seen that, but el na did use either book values or other values for manure applied by small farms that they also applied on.

Benjamin Atkinson 12:10 PM:

por que?

Burdett, Cheryl 12:13 PM:

Ahh, was that allowed.

Benjamin Atkinson 12:18 PM:

It seems so. Since the small are not under the CAFO rules, the CAFO simply has to do their best to account of rall nutrients applied to field.

Burdett, Cheryl 12:49 PM:

Would you know if they applied more manure than what was approved under it planned spreading plan is that a violation? Since that was the approved application rate

Benjamin Atkinson 12:51 PM:

unclear. The feeling that I got was that

Benjamin Atkinson 12:51 PM:

One the one had the permit does state that...

Benjamin Atkinson 12:51 PM:

The permitte shall land apply manure and process wastewater in compliance with the departmetn approved nutrient management plan.....

Benjamin Atkinson 12:52 PM:

and that

Benjamin Atkinson 12:52 PM:

The management plan may be amended at any time provided the proposed amendements are approved in writing by the department...

Benjamin Atkinson 12:52 PM:

Changes requiring a plan amendment include, but are not limited to, changes to application rates...

Burdett, Cheryl 12:53 PM:

So they would have to get approval?

Benjamin Atkinson 12:53 PM:

on the other hand if the application is not over application then what are we really complaining about.

Benjamin Atkinson 12:53 PM:

slash

Burdett, Cheryl 12:53 PM:

I don't know yet. It might be a requirement because of the condition of the soil type.

Burdett, Cheryl 12:53 PM:

To have to apply less

Benjamin Atkinson 12:54 PM:

You could argue that that the a2809 application rate is listed in the NMP and should be considered the upper limit of what they could spread.

Burdett, Cheryl 12:55 PM:

Yes correct I could argue that.

Benjamin Atkinson 12:55 PM:

I suspect that technically, yes, it is a violation, but that WDNR wouldn't/doesn't interpret it that way.

Benjamin Atkinson 12:55 PM:

But I don't know that.

Benjamin Atkinson 12:55 PM:

I don't think you would get management to sign off on an order with that being the only violation.

Benjamin Atkinson 12:56 PM:

but again I don't know that.

Burdett, Cheryl 12:56 PM:

Ok. I know that because CSD is in sandy soil they may be required to apply less manure because of it leaching past the root zone into the groundwater.

Benjamin Atkinson 12:56 PM:

is that in the regs?

Burdett, Cheryl 12:57 PM:

I'm not sure yet. I know that following the NMP is part of the regs.

Burdett, Cheryl 1:07 PM:

Do you have access to ArcGis

Benjamin Atkinson 1:10 PM:

I think so

Burdett, Cheryl 1:11 PM:

Could I send you some photos with GPS coordinates that you could put on a map.

Burdett, Cheryl 1:15 PM:

If you are to busy don't worry, I can try and do it Monday. I just cannot seem to get ArcMaps to load.

Benjamin Atkinson 1:19 PM:

I'm trying to load arc now.

Burdett, Cheryl 1:20 PM:

Ok. Good Luck.

Benjamin Atkinson 1:28 PM:

send the photos

Burdett, Cheryl 1:28 PM:

Ok. Great.

Benjamin Atkinson 1:54 PM:

My computer is super slow

Benjamin Atkinson 1:54 PM:

it is still working

Burdett, Cheryl 1:54 PM:

Ok. Did the pictures send.

Benjamin Atkinson 1:55 PM:

They did